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1/28/03
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SAMMI D. WRIGHT,

Plaintiff

v.

BEULAH HADRICK,
CHARLEEN SZABO,
SCOTT SHREVE and
RAY KENT,

Defendants

:
:
:
:
: NO. 1:CV-00-1657
:
: (JURY TRIAL)
:
:
: (J. Conner)
:
:

FILED
HARRISBURG, PA
JAN 27 2003
MARY L. DUNN, CLERK
FOR

MOTION TO CONTINUE TRIAL

Defendants, Beulah Hadrack, Charleen Szabo, Scott Shreve, and Ray Kent, through their attorneys, THOMAS A. MARINO, United States Attorney, and MARY CATHERINE FRYE, Assistant U.S. Attorney, request that this Court grant the within Motion to Continue Trial, and in support thereof state:

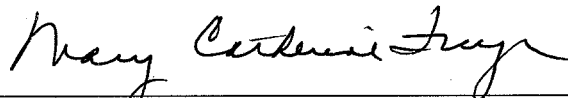
1. On or about October 1, 2002, defendants filed their Motion for Judgment on the Pleadings or for Summary Judgment.
2. The said motion has been briefed and ripe for decision since October 23, 2002.
3. By Order dated October 31, 2002, this case was placed on the March, 2003 trial list.
4. Pretrial memoranda, joint jury instructions and proposed voire dire questions are due February 5, 2003.
5. Final preparation for the trial of this case will require an extensive commitment of time of the part of counsel for plaintiff and defendants over the next five weeks.

6. Such preparation will not be necessary if the Court grants defendants' pending dispositive motion.
7. To avoid possibly unnecessary expenditure of time and resources, defendants respectfully request that the trial of this case be continued until at least 60 days after the Court renders its decision on the pending dispositive motion.
8. Counsel for plaintiff concurs in this request.

WHEREFORE, defendants respectfully request that the trial in this case be continued until at least 60 days after the Court renders a decision on defendants' pending Motion for Judgment on the Pleadings or for Summary Judgment.

Respectfully submitted,

THOMAS A. MARINO
United States Attorney



MARY CATHERINE FRYE
Assistant U.S. Attorney
228 Walnut Street
Harrisburg, PA 17108
(717) 221-4482

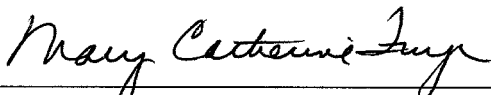
Dated: January 27, 2003

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SAMMI D. WRIGHT,	:
	:
Plaintiff	:
	:
v.	: NO. 1:CV-00-1657
	:
BEULAH HADRICK,	: (JURY TRIAL)
CHARLEEN SZABO,	:
SCOTT SHREVE and	:
RAY KENT,	: (J. Conner)
	:
Defendants	:

CERTIFICATE OF CONCURRENCE

The undersigned certifies that she has contacted counsel for plaintiff and that he concurs in this Motion to Continue Trial.



MARY CATHERINE FRYE
Assistant U.S. Attorney
228 Walnut Street
Harrisburg, PA 17108
(717) 221-4482

Dated: January 27, 2003

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SAMMI D. WRIGHT, :
 : Civil Action No. 1:CV-00-1657
Plaintiff, :
 : (Judge Conner)
v. :
 :
BEULAH HADRICK, CHARLEEN :
SZABO, SCOTT SHREVE and RAY :
KENT, :
 :
Respondents :

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That this 27th day of January 2003, she served a copy of the attached

MOTION TO CONTINUE TRIAL

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

ADDRESSEE(S)

Don Bailey, Esquire
4311 N. 6th Street
Harrisburg, PA 17110


DAWN L. MAYKO
Legal Assistant